

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. <u>M-20-451-P</u>
	)	
VIPAL, INC.,	)	Violation: 8 U.S.C. § 1324a(a)(2)
	)	8 U.S.C. § 1324a(f)(1)
Defendant.	)	

I N F O R M A T I O N

The United States Attorney charges:

Introduction

At all times relevant to this Information:

1. VIPAL, INC., operated two restaurants in Stillwater, Oklahoma, called Palominos Authentic Mexican Restaurant (“Palominos”) and El Vaquero Mexican Restaurant (“El Vaquero”).

Counts 1 through 35  
(Continuing Employment of Unauthorized Aliens)

2. The United States Attorney incorporates paragraph 1.
3. From in or about August 2017, to on or about September 4, 2019, in the Western District of Oklahoma,

-----VIPAL, INC.-----

engaged in a practice and pattern of continuing to employ in the United States certain aliens, as specified in the table below, knowing that said aliens were unauthorized aliens (as defined in Title 8 United States Code, Section 1324a(a)(h)(3)), with respect to such employment.

Count	Location	Name
1	El Vaquero	Ayala, Betsabet
2	El Vaquero	Cano-Reyes, Karina
3	El Vaquero	Cazares-Mata, Miguel Angel
4	El Vaquero	Flores-Contreras, Hector
5	El Vaquero	Gomes-Hernandez, Amilio
6	El Vaquero	Gomez-Diaz, Eleazar
7	El Vaquero	Gomez-Hernandez, Omar
8	El Vaquero	Herrera, Adriana
9	El Vaquero	Herrera-Perez, Ernesto
10	El Vaquero	Hernandez, Miriam
11	El Vaquero	Herrera-Rodroguez, Editor Uriel
12	El Vaquero	Leon-Tovar, Jose Fernando
13	El Vaquero	Lopez-Gomez, Andres
14	El Vaquero	Luna, Ana Valentina
15	El Vaquero	Nieto-Vazquez, Rosalva
16	El Vaquero	Herrera-Perez, Sanjuana
17	El Vaquero	Villasenor, Ana B.
18	El Vaquero	Villasenor, Maria Guadalupe
19	Palominos	Alvarado-Cano, Hilda
20	Palominos	Diaz-Mendez, Guillermo
21	Palominos	Fuentes, Maria Del Rosario
22	Palominos	Gomez, Oriana
23	Palominos	Herrera, Adriana
24	Palominos	Hernandez, Jovani
25	Palominos	Hernandez, Natanael
26	Palominos	Hernandez-Alvarez, Juan Carlos
27	Palominos	Hernandez-Mendoza, Esau

28	Palominos	Hernandez-Moreno, Benido
29	Palominos	Leon-Tovar, Jesus Alberto
30	Palominos	Martinez, Alfonso
31	Palominos	Melendez, Gabriel
32	Palominos	Ortega, Emily
33	Palominos	Perez-Mendoza, Jesus Antonio
34	Palominos	Sanchez, Miguel
35	Palominos	Sanchez-Martinez, Juventino

All in violation of Title 8, United States Code, Section 1324a(a)(2) and  
1324a(f)(1).

TIMOTHY J. DOWNING  
United States Attorney



WILLIAM E. FARRIOR  
Assistant United States Attorney